



Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

**Public Meeting
Wednesday July 30th, 2003
6pm - 8 pm
Fuller Lodge
Los Alamos, New Mexico**

**Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.**

*Trails are an important part of Los Alamos county.
They are used by Los Alamos residents and visitors.
They are used by employees at NNSA and LANL.
They provide exercise and recreation for many people.
Several of the trails are historic.
Several need improvement, but they are all needed.
If you would like a response please provide your name and a mailing address:*

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes

No Thanks

X

If "Yes", where should it be sent?

If you would like to mail your comments send them to:

Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8890.

The public comment period ends August 5, 2003.

Ms. Elizabeth Withers
528 35th Street
Los Alamos, NM 87544

Re: Public Comment to the NNSA Report "Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico," July 14, 2003

After reading the report on Trails Management at LANL, it seems that the options presented are to either shut down use of all trails immediately, or shut down *almost* all trails slowly and painfully, in an expensive and bureaucratic way. Opening new trails would be a last priority, done by committee.

The main use of these trails is recreational, and yet this factor is hardly considered at all in the report. There is a value to LANL and NNSA in having healthy employees and a satisfied community. The report is very concerned with addressing the needs of the neighboring Pueblos, but never mentions addressing the concerns of the local community in Los Alamos.

The discussion presented does not convince me that this will result in a "balanced" use of the trail system. I don't understand why they dismissed as unfeasible the alternative to study each trail individually. Their argument appears to be that they can't study them individually because they have to study them all at once.

If you just read the report, the option to shut down the trails seems obviously the best choice in terms of cost-effectiveness. It makes the Pueblos happier. It addresses safety concerns by disallowing all use. It's the cheapest alternative. Since the local community and recreational use of the trails isn't a consideration, there's no disadvantage.

It appears that a request from the County for access to 14 trails will be met with an answer of closing down most of them. The Lab has been dragging its feet for years on opening up land to the public. The DOE land has too many unknown dangers dating back to the race for the bomb, when there was indiscriminate use of the land for experimentation. Now instead of resolving those problems and making more land available, I feel as though the trails that were open to the public all this time are under attack, at risk of being shut down.

I know there are safety, hazard, and environmental problems that need to be addressed for the trails. But the proposed plan doesn't put enough emphasis on keeping the trails open to the public. Not only should there be emphasis on keeping the trails available, but the goals should go beyond that, to transfer land to the County.

Wherever possible, the trails should be transferred to Los Alamos County. The County could then take on responsibility for environmental assessments and determine appropriate "balanced" use of the trails. If NNSA must maintain control over the trails, the proposed LANL Trails Management option does not appear to be in the best interest of the public. A more stream-lined management option is needed. There ought to be an "innocent until proven guilty" concept for the trails. Instead of conducting all the expensive and time-consuming studies listed in the report, keep all the trails open and study only those for which specific threats have been documented.

Furthermore, study the trails only to determine if there are security concerns for lab operations, or nuclear hazards on the trails themselves. This is within the mission of NNSA. If neither of these problems exist, transfer the trail to the County and let them handle the environmental impact studies, Indian's social concerns, and other issues. The local County is better able to determine local issues and concerns, and would do a better job at considering the Los Alamos residents than the management plan proposed in this report.

Sincerely,

Sonya Lee
Sonya Lee

I am one of hundreds (thousands?) that use the trails on DOE property for hiking, nordic skiing, running and mountain biking. These activities constitute one of the most important aspects of my work day, and are facilitated by the fact that I can leave from my office door and be in the forest. PLEASE do not close access to trails on lab land.

Paul A. Johnson

Dear Ms. Withers:

I have read the LANL Trails Management Proposal and prefer the Proposed Action, establishment of a Trails Management Program. The Trails Closure Alternative would be devastating to residents of White Rock--we love these trails (especially Potrillo, Water Canyon, Ancho Canyon, and Mortandad.

It would be good for everyone if these trails were signposted and maintained more ecologically.

Is a map of these trails available somewhere? I was uncertain about Broken Mesa and Painted Cave (presumably not the Bandler Painted Cave).

Thanks for inviting comment.

Thomas and Rebecca Shankland

Dear Ms. Withers --

I would like to add my voice to those who are against the closures of so many of our favorite trails. I am a resident of the Western Area and one of the joys of my life in this town of limited entertainments is my daily dog walks on the local trails.

I can understand the need to close many of these trails during these times of high fire danger but to close them (perhaps permanently?) for "security" reasons seems impractical to me. How many staff will it take to patrol all the trails? I feel that to allow local citizens and Lab employees access to the trails gives you a free "citizen patrol". I'm sure many of us would be willing to work with DOE on trail maintenance and safety issues, as we are already doing with the various local trail committees. I hope we will be given that opportunity.

I also hope that we will be notified of meetings about the trails in a more timely fashion so we have an opportunity to make our voices heard.

Thank you for letting me put in my two cents worth.

Molly MacKinnon

Hello,

My wife and I live in La Senda and for almost 30 years have enjoyed hiking in the government land south of Pajarito Acres. Of course, we would hate to see that privilege denied to us. On the other hand I believe a trails management study would be very useful to both hikers and the environment. Marking of trails suitable for hiking and horseback riding would be useful in keeping people from creating new trails. Also, some of the current "trails" should be improved since they have deep gulleys in them.

Sincerely yours,
Charles & Linda Anderson

I am part of the dog team of Mountain Canine Corps. As a canine unit it is very important that my dog and I maintain our excellence in the skills needed to locate and rescue persons gone missing.

I am sure if you or your love ones were in such an undesirable circumstance, you would thank the powers that be, that a Search and Rescue dog came upon you and resulted in saving a limb or even your life.

Please use your influence revise the proposal to allow for lab land use for canine Search and Rescue practice. Thanking you in advance for your assistance in this very important matter to the community.

Sincerely,
Saundra I. Costick
Sandi Costick

I believe it is important to allow access to as many undeveloped lab areas as possible for jogging, hiking, and mountain biking at lunch time or after work for recreational and fitness purposes. Running or walking on the highways is very dangerous, and lack of opportunities for physical fitness would impact job quality, performance, and morale.

Norbert Ensslin,

I would like to comment on the "Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program". Nowhere in the document is there any consideration given to the benefits to Laboratory workers provided by the recreational use of these trails on Laboratory/DOE property. Every day, one can see hundreds of Lab workers outside during lunchtime walking, running, and cycling on these trails, which benefits all involved - the employees, the Laboratory, and the DOE. On the one hand, the Laboratory tries to promote the physical and mental well-being of its employees, and then it acts as if it has no interest in such matters by proposing to shut down the trails that are so beneficially used by its employees. The users of these trails stay on the trails; therefore, they have little or no impact on nearby sensitive natural or cultural resources. I urge you to keep these trails open to employee use and, where permitted, to general public use.

Schillaci

Dear Ms. Withers:

Thank you for the opportunity to comment on the draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program.

We are cautiously optimistic that the Proposed Action will result in a better, more clearly defined trail network within Los Alamos County. However, we believe that the need for security and cultural sensitivity must be balanced with the need for a community-wide, interlocking trail network for transportation and recreation. Access to a nearby trail network is an invaluable tool in the recruitment and holding of employees at LANL. For a large number of employees, the trails provide a quick, mid-day break from high-stress jobs. The trails are part of the cultural framework of Los Alamos.

We have the following concerns with the proposal:

The proposed trail working group should include citizen involvement by trail users. It should not be composed solely of managers who do not have a fundamental understanding of the value of trails to the Los Alamos community.

Trails that connect the community with the laboratory are of critical importance to the Los Alamos County Trail Network.

The initial assessment of the trail system should not take more than six months. Following the Cerro Grande Fire, 100 miles of trails were assessed in three weeks for a total cost of less than \$2,500.

The trail plan should include a provision for building new trails on DOE land holdings where appropriate. An example is the community-based Perimeter Trail, which, with the exception of a 1.5 mile section on DOE land holdings, links the community from Barranca Mesa to Bandelier National Monument and traverses private, County, and National Forest Service land. Completion of this trail through DOE land holdings along New Mexico Highway 501 would demonstrate the sincerity of the current LANL directives toward cooperation between the community and the laboratory.

Sincerely,

The Trails and Pathways Subcommittee of the Los Alamos County Parks and Recreation Board

Craig Martin
Sarah Gustavson
James Sprinkle
Georgia Strickfaden
Kathy Campbell



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the use of Lab lands for horse trails, walking dogs etc. is a much appreciated benefit of living in white Rock. While we understand temporary closings for fire danger, please do not make these canyons + mesas off limits at other times of the year. Please consider the opinions of the local residents in your final decisions.
If you would like a response please provide your name and a mailing address:

Louise Jandacek, [REDACTED]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ☒

No Thanks ☐

If "Yes", where should it be sent?

Louise Jandacek
[REDACTED]
[REDACTED]

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Environmental Assessment DOE/EA-1431 urges the adoption of a trails management system at Los Alamos National Laboratory, or suggests wholesale closure of the trails as an alternative. With all certainty the Closure Alternative is entirely unacceptable. While the Proposed Action Alternative is preferable to outright trail closure, the merits of the Proposed Action are questionable, as the Proposal does not provide assurances of the scope of the final actions. I agree that the reasons cited in the EA are sufficient to demand a trails management program. However, the Proposed Alternative is inchoate: it states that something must be done, but states only what may be done, including loss of trails. Thus, the Lab community must weigh a proposal whose consequences will not be known until the Proposal's project planning stages are underway. Since it is possible under the terms of the Proposed Action Alternative for an indeterminate amount of trails to be lost, in the worst case the proposed trail management plan may result in a substantial reduction in the amount of available trails. This is an unacceptable outcome, as it would be a detriment to the quality of working life at this institution.

In order to provide a zero-to-small net loss of accessible trails, the Proposed Action Alternative should be amended to explicitly include conservation of trails as a priority goal: close one trail, open another. In addition, it would be sensible to perform a specific initial project plan for a number of trails that is then put forth for public examination before the overall trail management plan is set for final approval. In this way the community can better understand the consequences of implementing this trail management system at Los Alamos.

Compromise of the trail system through adoption of either the Closure Alternative or an improperly conceived Action Alternative would constitute an egregious disregard of the well-being of the Lab community. Not only is this resource a boon to those already in LANL's employ, but it serves as a legitimate incentive to potential new hires who value access to the great natural beauty of the Lab

environs. I support the adoption of a trails management program, but I encourage the National Nuclear Security Administration to redraft the present Proposed Action Alternative to better insure that one of the most valuable employee resources available is in no way diminished.

Sincerely,

Andrew Saab, Ph.D.

I use the trails mentioned in the EA on almost a daily basis, at least on an every other day basis. This includes weekends. One of the benefits to working in Los Alamos County and at the Lab in particular is the access to a variety of fitness trails on which I and my friends run, hike and mountain bike. I moved out here from the East coast and the closest trails we could find were many miles away. I am a fitter, healthier person since moving out here, and I believe access to off-road trails plays a big part in this. I would hate to see the closure of these trails, as I do not see the impact of that on Homeland Security. A Terrorist threat is much more likely to be considered effective on a major transportation route than via a small trail.

Sincerely,

Amy Regan

LANL employee



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I disagree strongly that the socio-economic effects of complete trail closure would be minor! Residents of Los Alamos have been through many stressful events since 2000. The threat of possible eventual closure of all trails will continue to lessen moral and add to the escalating cost of health and mental health insurance.

(CONT ON BACK) address: JERRY BUCHHOLZ, [REDACTED] (CONT ON BACK)

Would you like us to send you a copy of the final EA and Finding of No Significant Impact? (HOW DO YOU KNOW THERE WILL BE NO SIGNIFICANT IMPACT)

Yes ☒ No Thanks ☐

If "Yes", where should it be sent?

SAME AS ABOVE

If you would like to mail your comments send them to:

Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

Property values would be lowered by a considerable amount in Pajarito acres. A selling point for these houses is the trail system in Potlullo and Water Canyon. trail closure would cost home owners big \$s.

Mountain Canine Corps
P. O. Box 238
Los Alamos, NM 87544

August 2, 2003

Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street
Los Alamos, NM 87544



03 AUG -4 PM 3:19

Comment on the Predecisional Draft Environmental Assessment (EA) for the Proposed Los Alamos National Laboratory (LANL) Trails Management Program (DOE/EA-1431)

As president of the Mountain Canine Corps (MCC), I am writing on behalf of its membership. MCC is a nonprofit volunteer search and rescue (SAR) organization. We believe that the Proposed Action of LANL Trails Management Program and the Trails Closure Alternative would negatively affect our team's ability to adequately prepare for missions, and, therefore, negatively impact both socioeconomic and health and safety resources locally and nationally. We also believe that these impacts were not considered in the writing of the draft EA.

Our team was founded in 1984 and is based in Los Alamos, NM. Our mission is the training and fielding of search dogs to help locate missing persons; we save lives and recover bodies. MCC is a member of the New Mexico Emergency Services Council and is recognized by New Mexico's Search and Rescue Review Board. We focus primarily on training for and participating in SAR missions in the wilderness settings of the State of New Mexico. We extensively use the areas that would be affected by the Proposed Action and the Trails Closure Alternative. Specifically, we use the following areas for our training practices and for mission readiness certification examinations:

- 1) Rendija Canyon, area north and west of Sportsmen's Club,
- 2) TA-62, area west of West Road, north of NM 501 and both sides of Ski Hill Road,
- 3) TA-58, Fitness Trail area
- 4) TA-08, unfenced areas east and west of NM 501,
- 5) TA-72, area west of Rt.4, south of NM 502, lower Los Alamos Canyon and both sides of East Jemez Rd., east of the PTLA Firing Range, and
- 6) TA-70 and TA-71, areas south and east of Rt. 4, west of Pajarito Acres, north of Ancho Canyon.

A map with these areas can be found in Attachment 1. Changes to access to these areas under either alternative would adversely affect our team's ability to train and test. In the past few years, we have already been adversely affected by the loss of practice areas. For example, the area that is currently being

transferred in the Rendija area was previously used as an examination area and other areas, such as Quemazon, have been lost to development. The Cero Grande fire also caused the loss of suitable areas for training. Our team is losing habitat.

In particular, the impact on health and safety resources, because of effects of the Proposed Action or the Trails Closure Alternative on our team, should not be underestimated. We are now one of the largest wilderness canine SAR teams in the nation and currently composed of 40 (human) members, 16 mission ready dogs, and 6 dogs in training. Of our canines, 5 dogs are mission ready in air scent, 10 are mission ready tracking/trailing dogs, and 8 dogs are mission ready in cadaver location. We are on-call for missions 24 hours a day, 7 days a week. Although our focus is primarily on wilderness SAR, we have also fielded dogs after disasters, including the tornados in Oklahoma City. One of our canines and handlers served at the Pentagon after September 11th as part of FEMA's New Mexico-Task Force 1. Two of the more recent examples of our contributions to SAR in the news headlines are: "Canine Corps solves missing person case" (*LA Monitor*, Nov. 2002) and "Search and rescue team saves resident's life" (*LA Monitor*, Sept. 2002). A letter from the New Mexico State Police Resource Officer James Newberry that explains our contributions to the health and safety of the citizens of New Mexico can be found in Attachment 2.

In order to properly train both our canines and personnel for SAR missions, we require the frequent use of practice areas that are as varied as possible in both terrain and vegetation. We train twice weekly throughout the year. Approximately 80% of our practices in the last year have occurred in LANL land areas that would be affected. During the winter, we use the LANL land areas almost exclusively. As mentioned above, we are a team of all volunteers and most people on the team hold full-time Laboratory positions. Therefore, traveling a great distance to a practice location is not feasible for most team members. Moreover, limitations on the team's ability to use these areas for training will negatively affect the quality of our search dogs and the preparedness for missions. Ultimately, these limitations would impact the health and safety of the citizens of New Mexico. We not only save lives, but our contributions are also well appreciated by the local communities. We leave a positive image of the people of Los Alamos, fostering good community relations. In addition, our team hosts mock searches, bringing other New Mexico SAR teams into the area for joint practices. Therefore, we also believe limitations that arise from the Proposed Action or Trails Closure Alternative would also impact the socioeconomic welfare of our community.

We would like to suggest that the environmental consequences in the draft EA be reconsidered with user groups such as ours and other local search and rescue teams in mind. We respectfully submit some specific suggestions for additions

and changes (highlighted in italic font) to the draft EA, which are outlined below, for your consideration.

Section 1.3 Statement of Purpose and Need for Agency Action

Add text of "LANL social trails and undeveloped areas also have been used extensively for training and testing volunteer search and rescue personnel, including canine search teams, mounted search personnel, communications, high angle rescue and medical teams."

Section 2.1 General Overview of Proposed Action

Broaden to read "Workers at LANL, officially invited guests, and other approved groups performing tasks explicitly requiring use of a trail closed to recreational users may be permitted to do so."

Section 2.1.1: Establishment of Trails Assessment Working Group.

Development of End-State Conditions and Recommendation to Close or Maintain Trails

Amend last two sentences to read "Options could include restricted use by workers at LANL, officially invited guests, and other approved groups performing tasks explicitly requiring use of trails; or could be open to the general public for recreational purposes. The appropriate options for end-state trail use would include non-motorized modes such as walking and hiking, horseback riding, cross-country skiing, bicycling, and the training and testing of search and rescue dogs and personnel."

Section 2.1.4 Safety Measures; Public Safety Measures

Add sentence to read, "Certain trails could be appropriate for equestrian use or for dog exercise use; access to these trails would be suitably provided and the trails would be appropriately posted. Other trails could be posted informing users that horses or dogs would not be permitted and trail access would exclude horses or dogs accordingly. Use of these trails for the training and testing of mounted search and rescue personnel and canine teams would be permitted."

Section 3.1 Socioeconomics

Add a section in the first paragraph: "Los Alamos is home to several active volunteer search and rescue teams, who provide important emergency services throughout the state. Canine search teams, mounted search personnel, communications, high angle rescue and medical teams contribute significantly to the safety and welfare of state and local citizens. These groups require access to wilderness areas for training and testing purposes, and have made extensive use of LANL/DOE trails and undeveloped lands."

Section 4.0 Environmental Consequences

Table 3. Comparison of Alternatives on Affected Resources

Socioeconomics Row, Trails Closure Alternative

Add phrase "Would limit LANL trail use to workers at LANL, officially invited guests, and other approved groups"

Health and Safety Row, Proposed Action

Change to "Negative effect on public health and safety by limiting opportunities for the training and testing of volunteer search and rescue personnel"

Health and Safety Row, Trails Closure Alternative

Change to "Negative effect on public health and safety by limiting opportunities for the training and testing of volunteer search and rescue personnel"

4.1 Socioeconomics

4.1.1 Proposed Action

Add text to second paragraph: "Loss of access to trails and undeveloped areas would have a significant negative impact on the ability of volunteer wilderness search and rescue personnel to adequately train and prepare for emergency activities in New Mexico."

4.1.2 Trails Closure Alternative

Add text to second paragraph of "Loss of access to trails and undeveloped areas would have a significant negative impact on the ability of volunteer wilderness search and rescue personnel to adequately train and prepare for emergency activities in New Mexico."

4.7 Health and Safety

4.7.1 Proposed Action

Add text "Trail and area closures resulting from the Proposed Action would negatively impact public health and safety by limiting opportunities for the training and testing of volunteer search and rescue personnel."

4.7.2 Trails Closure Alternative

Add text "The Trails Closure alternative would have negative impacts on public health and safety by limiting opportunities for the training and testing of volunteer search and rescue personnel, negatively impacting search and rescue mission outcomes."

4.7.3 No Action Alternative

Add text "Training and preparation of wilderness search and rescue personnel for participation in emergency activities benefiting New Mexico citizens would continue as it has in the past."

6.0 Cumulative Effects

Socioeconomics: "The Proposed Action would seek to strike a balance between the desire to use LANL trails for recreation and appropriate volunteer activities, the need for LANL to foster environmental stewardship..."

We believe that our comments are appropriate and practicable to be considered in the final EA. Thank you for your consideration of these issues and comments.

Sincerely,

Cyndi Wells

Cyndi Wells, on behalf of the members of MCC
President
Mountain Canine Corps

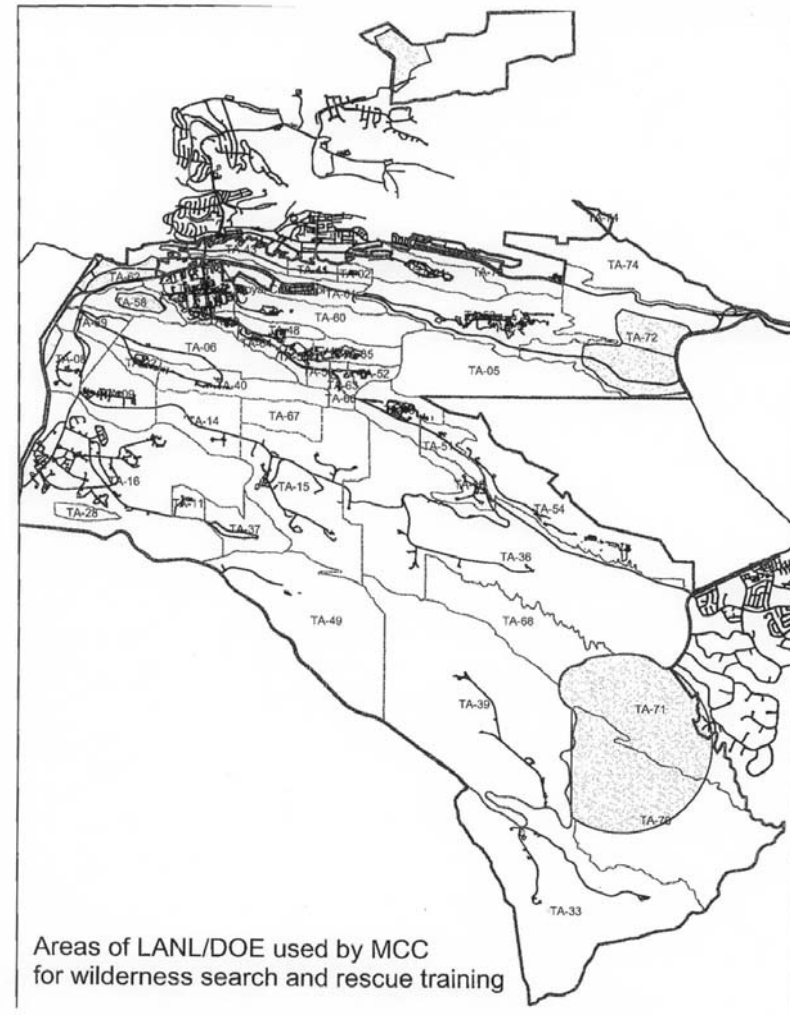
Also, signed:

Sue Barns

Sue Barns
Training Director
Mountain Canine Corps

Wendee Brunish

Wendee Brunish
Vice President
Mountain Canine Corps



Areas of LANL/DOE used by MCC
for wilderness search and rescue training



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I feel there is a necessity to distribute facts in a timely manner between agencies governing the land and the public which includes retired persons, non-LANL employees and users such as hikers, dog walkers, bikers, horseback riders, search & rescue training and rock climbers.

If you would like a response please provide your name and a mailing address:

Barbara Ramsay 6 Erie Lane Los Alamos NM 87544

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ☒

No Thanks ☐

If "Yes", where should it be sent?

Barbara Ramsay [redacted]

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I would favor a trails management program provided there isn't an exclusion of use to the listed area while a plan is being implemented. This would limit the quality of life for some White Rock area residents. Having lived in Los Alamos for 50 years and having been instrumental in the procurement and development of Pajarito area so as to provide an atmosphere in which to raise our children, while enjoying nature, and now retire with the freedom to hike and ride in the area has been rewarding. Because of this nurturing atmosphere our children have decided on careers linked to nature, a geologist, an entomologist and a veterinarian who founded the Wildlife Center to rehabilitate injured animals back to the wild. Our fourth child is a local contractor who decided to raise his family in this environment.

Please keep this land available to the residents.

Barbara Ramsay

P.S. The Pajarito Riding Club has cooperated with Bandelier Nat'l Monument to maintain trails and monitor their usage. This has included removal of several tons of trash left from before the area was fenced and signed.



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Aug. 1, 2003

Horse patrols and other equestrian activities throughout Los Alamos County and Laboratory lands ought to be encouraged and not curtailed for the following reasons:

see overleaf

If you would like a response please provide your name and a mailing address:

Petr Jandacek [redacted]
[redacted]
[redacted]

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

☒ *Yes, Please*

☐ *No Thanks*

If "Yes", where should it be sent?

[redacted]

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- #1. Before the laboratory was established there was a long tradition and culture of private enterprise ranching and the Ranch School. One could argue that horse patrols were a mandatory curriculum and vocation.
- #2. Much of early Los Alamos Laboratory security was provided by mounted patrols. Thus, an equestrian tradition is in fact "grandfathered in" our lifestyle and represents reasonable expectations.
- #3. White Rock and Los Alamos past and present equestrians have provided valuable services in recent decades when called upon to perform search and rescue operations for the lost, injured and dead. Cleanup, erosion control and safety mitigation were a routine activity when I served in the context of Fair and Rodeo Board, 4-H parent and officer of the Pajarito Riding Club. The prowess and success of the riders was the direct consequence of their intimate knowledge of the area.
- #4. Concerns about security and / or vulnerability to wildfires or other ecological disasters could be (to a measure) put to rest if riders were encouraged to report or perhaps even remediate when appropriate. This could be perceived as an extension of the "Neigh-bor Hood" Watch.
- #5. The Human Resources augmented by the Equine are not being utilized efficiently by Los Alamos. They should be sponsored and commissioned.
I write this with no personal advantage to gain but motivated by altruism. It is lonely in my saddle since my horse died several years ago....

Petr Jandacek (past president of Pajarito Riding Club, and past Member of the County Fair and Rodeo Board)
127 La Senda Rd. Los Alamos, New Mexico 87544
Tel: 672 9562 e-mail: jandacek@mesatop.com

Petr Jandacek
Aug. 1, 2003